

SM/2017R00138

FILED

MAY 28 2019

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AT 8:30 12:26 pm JS
WILLIAM T. WALSH
CLERK

UNITED STATES OF AMERICA : Hon.
:
v. : Crim. No. 19- CR- 390 (SDW)
:
WILLIAM PANZERA : 21 U.S.C. § 846
: 18 U.S.C. § 1956(h)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute)

From in or about February 2016 through in or about June 2018, in the District of New Jersey, and elsewhere, defendant

WILLIAM PANZERA

knowingly and intentionally conspired and agreed with others to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of controlled substance analogues, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, and controlled substances, including the following:

- a. 100 grams or more of 4-FIBF, a Schedule I controlled substance analogue until May 3, 2017, and a Schedule I controlled substance thereafter; and
- b. 100 grams or more of furanyl fentanyl, a Schedule I controlled substance analogue until November 29, 2016, and a Schedule I

controlled substance thereafter, contrary to Title 21, United States Code, Sections 802(32), 813, 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

(Conspiracy to Launder Monetary Instruments)

1. From in or about February 2016 through in or about May 2018, in the District of New Jersey and elsewhere, defendant

WILLIAM PANZERA

knowingly and intentionally conspired and agreed with others to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, namely conspiracy to distribute and possess with intent to distribute controlled substance analogues intended for human consumption and controlled substances, to wit: furanyl fentanyl and 4-FIBF, contrary to Title 18, United States Code, Section 1956(a)(2)(A).

GOAL OF THE CONSPIRACY

2. It was the goal of the conspiracy for defendant WILLIAM PANZERA and others to send payments from the United States to places outside the United States to purchase controlled substances and controlled substances analogues.

MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that in or about January 2016, defendant WILLIAM PANZERA set up a company ("Company-A") in Moonachie, New Jersey in order to pay for shipments of fentanyl analogues from China.

4. It was further part of the conspiracy that WILLIAM PANZERA and others sent and caused to be sent a monetary instruments and funds from the

United States to places outside the United States to purchase controlled substances and controlled substance analogues, including the following transactions:

a. On or about February 24, 2016, defendant WILLIAM PANZERA used Company-A's bank account to wire approximately \$20,000 to a bank account in China to purchase a controlled substance analogue for importation into and distribution in the United States.

b. On or about March 2, 2016, defendant WILLIAM PANZERA wired \$15,000 to an account in China to purchase a controlled substance analogue for importation into and distribution in the United States.

c. On or about March 4, 2016, defendant WILLIAM PANZERA attempted to wire \$11,000 to an account in China to purchase a controlled substance analogue for importation into and distribution in the United States.

d. On or about March 10, 2016, after the attempted wire transfer of \$11,000 on March 4, 2016 was returned due to an incorrect account number, defendant WILLIAM PANZERA wired \$16,000 to an account in China to purchase a controlled substance analogue for importation into and distribution in the United States.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the controlled substance offense in violation of 21 U.S.C. § 846, as charged in Count One of this Indictment, defendant

WILLIAM PANZERA

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT TWO

2. As a result of committing the money laundering offense charged in Count Two of this Indictment, defendant

WILLIAM PANZERA

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such money laundering offense, and all property traceable to such property.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-CA-390 (SOW)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

WILLIAM PANZERA

INDICTMENT FOR

**21 U.S.C. § 846
18 U.S.C. § 1956(h)**

1 A True Bill,

Foreperson

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NEWARK, NEW JERSEY

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STEPHEN A. SOLA
MONEY LAUNDERING AND ASSET RECOVERY SECTION